

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

In the Matter of

Telecommunications Relay Services and
Speech-to-Speech Services for Individuals with
Hearing and Speech Disabilities

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CG Docket No. 03-123

APPLICATION FOR THE RENEWAL OF SNAP TELECOMMUNICATIONS, INC.'S
CERTIFICATION AS A VRS PROVIDER

On May 8, 2006, the Commission certified for a five year period Snap Telecommunications Inc. (“Snap!VRS” or “Snap”) as a VRS provider eligible for compensation from the Interstate TRS Fund.¹ The Commission stated that Snap may apply for a renewal “[w]ithin ninety days prior to the expiration of [the] certification....”² The Commission has uniformly used the “within ninety days prior to the expiration” language in its Public Notices certifying VRS and IP Relay Providers regarding the certification renewal time period.

§ 64.606 (c)(2) of the Commission’s TRS rules provides in part that “[a] VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, **at least 90 days prior to expiration of certification**, containing the information described in paragraph (a)(2) of this section.” (emphasis added)³

¹ *Notice of Certification of Snap Telecommunications, Inc. as a Provider of Video Relay Service (VRS) Eligible for Compensation from the Interstate Telecommunications Relay Service (TRS) Fund*, (Public Notice), CG Docket No. 03-123, [FCC 06-67](#), released May 8, 2006.

² *Id.* at page 3.

³ 47 C.F.R. § 64.606 (c)(2)

Snap is not aware of any Commission guidance which addresses the apparent difference with respect to the renewal application filing period. Thus out of an abundance of caution, Snap is filing *pro forma* its application for renewal at least 90 days prior to the expiration date of its certification. Snap submits that it has timely satisfied § 64.606 (c)(2)'s documentation requirement by its filings of its annual reports regarding its continued compliance with the Commission's mandatory minimum standards applicable to VRS providers,⁴ its annual reports on progress towards meeting waived VRS requirements,⁵ and its annual complaint log summaries.⁶

Going forward, Snap will seek Commission guidance on what additional information, if any, is necessary within the ninety day period to complete the documentation in support of its certification renewal application.

Respectfully submitted,

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⁴ *Most recently* Snap Telecommunications, Inc.'s Annual Compliance Report, CG Docket No. 03-123 (filed April 22, 2010).

⁵ *Most recently* Snap Telecommunications, Inc.'s Annual Report on Progress Towards Meeting Waived VRS Requirements, CG Docket 03-123 (filed April 16, 2010).

⁶ *Most recently*, Snap Telecommunications, Inc.'s Annual Complaint Log Summary, CG Docket 03-123 (filed June 28, 2010).